

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KEEP CHICAGO LIVABLE, et al,  
Plaintiffs,

v.

CITY OF CHICAGO,  
Defendant.

No. 16 C 10371

Hon. Sara L. Ellis

**DEFENDANT’S MOTION FOR LEAVE TO FILE *INSTANTER* OVERSIZED BRIEF  
IN RESPONSE TO PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

Defendant City of Chicago (“City”), by its counsel, Stephen R. Patton, Corporation Counsel for the City of Chicago, hereby respectfully moves this Court for leave to file *instanter* the attached oversized memorandum, 20 pages in length, as the City’s response to Plaintiffs’ motion for preliminary injunction. In support of this motion, the City states as follows:

1. Pursuant to Local Rule 7.1, briefs submitted in opposition to a motion must not exceed 15 pages without leave of court.
2. Plaintiffs’ memorandum in support of their motion for preliminary injunction invokes a multitude of legal theories and doctrines, but often does not adequately address the elements of those doctrines or their application to the particular claims that Plaintiffs raise. The City respectfully submits that an additional 5 pages is warranted in response to Plaintiffs’ memorandum in order to adequately discuss these doctrines and to demonstrate their inapplicability to this case. The City believes that the discussion contained in these additional pages will ultimately reduce the workload of the Court in resolving Plaintiffs’ motion for

preliminary injunction, particularly under the streamlined schedule requested by Plaintiffs on their motion.

WHEREFORE, for the foregoing reasons, the City respectfully requests that the Court grant the City leave to file *instanter* the attached oversized brief.

Date: December 30, 2016

Respectfully submitted,  
STEPHEN R. PATTON,  
Corporation Counsel for the City of Chicago

By: /s/ Ellen McLaughlin

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